

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
NORTHERN DIVISION**

UNITED STATE OF AMERICA,

Plaintiff,

vs.

Case No. 23-CR-20116
District Judge Thomas L. Ludington

JOANNE DAVENPORT,

Defendant.

_____ /

**SUPPLEMENTAL BRIEF IN SUPPORT OF MOTION
FOR EXPERT FUNDS PURSUANT TO 18 U.S.C. § 3006A(e)**

Undersigned counsel filed a Motion for Expert Funds Pursuant to 18 U.S.C. § 3006A(e) on June 20, 2024. The Assistant United States Attorney concurred with the relief requested in the Motion. On July 17, 2024, an "In Person" Status Conference with held to discuss the merits of a polygraph examination in the instant matter. Counsel for Defendant and the Assistant United States Attorney have agreed to "Forensic Polygraph Services Inc.", a subdivision of Myres and Ruffino Polygraph, 13407 Farmington Road, Suite 100, Livonia, Michigan, 48150. The cost for the examination and report is \$850.00. The polygraph examination is tentatively scheduled for August 20, 2024, at 12:00 noon at the Livonia address.

Respectfully submitted,

/s/ Russell J. Perry, Jr.
Russell J. Perry, Jr.
Attorney for Defendant
4407 State Street
Saginaw, Michigan 48603
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Email: fahuat1@msn.com
[Bar Number: P26894]

Dated: August 13, 2024

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CERTIFICATE OF SERVICE

I, RUSSELL J. PERRY, JR., hereby certify that on the 13th day of August, 2024, I electronically filed the SUPPLEMENTAL BRIEF IN SUPPORT OF MOTION FOR EXPERT FUNDS PURSUANT TO 18 U.S.C. § 3006A(e) with the Clerk of the Court Using the E.C.F. system which will send notification of such filing to the following:

U.S. Attorney, 101 First Street, Suite 200, Bay City, Michigan 48708-5747

/s/ Russell J. Perry, Jr.
Russell J. Perry, Jr.
Attorney for Defendant
4407 State Street
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